

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

RONALD KEITH REESE

Case: 2:21-mj-30288

Assigned To : Unassigned

Assign. Date : 6/9/2021

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2019-October 2019 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1708	Mail Theft
18 U.S.C. § 1028A	Aggravated Identity Theft
18 U.S.C § 1029	Access Device Fraud

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: June 9, 2021City and state: Detroit, MI

*Complainant's signature*Erin B. Leipold- U.S. Postal Inspector*Printed name and title*

*Judge's signature*David R. Grand U.S Magistrate Judge*Printed name and title*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

IN THE MATTER OF:

RONALD KEITH REESE

DATE OF BIRTH: XX/XX/1993

Case No. _____

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Erin B. Leipold, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since January 2008. As part of my duties as a U.S. Postal Inspector, I conduct investigations of offenses involving mail theft, identity theft, access device fraud, and other financial crimes. I have worked this investigation in conjunction with the Bloomfield Township Police Department and the West Bloomfield Township Police Department. This affidavit is based on my personal knowledge, observations, training, and experience as well as information obtained from documents, electronic databases, witnesses, and other law enforcement agents involved in this investigation. The information contained in this affidavit is provided for the purpose of establishing probable cause for a criminal complaint, and thus, it does not contain all the details of the case known to me.

2. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of Mail Theft, in violation of 18 U.S.C. § 1708, Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A, and Access Device Fraud, in violation of 18 U.S.C § 1029 have been committed by Ronald REESE.

3. Search warrants 5:19-mc-51439-6, 5:19-mc-51439-7, 5:19-mc-51439-11 were previously obtained by Affiant in order to search REESE's residence and several electronic devices seized from a vehicle parked outside REESE's residence.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that Ronald REESE (xx/xx/1993) has engaged in a fraud scheme involving the theft and criminal misuse of personal identifying information (PII). Searches of his residence, a vehicle parked in the driveway of the residence, and electronic devices seized from that vehicle identified additional evidence related to an ongoing fraud scheme involving the theft and criminal misuse of personal identifying information (PII) in order to acquire and misuse retail credit accounts.

PROBABLE CAUSE

5. The U.S. Postal Inspection Service investigated numerous reports of mail thefts in Southfield, Michigan, and surrounding communities on a continuing basis from late 2018 into 2019. Residents of these communities reported finding rifled mail in various outdoor spaces such as ditches or wooded areas, awaking in the morning to find all the mailboxes on their street were open, or learning that checks or other negotiable items they were expecting to be delivered via the U.S. Mail were intercepted and negotiated by an unknown party.

6. In March 2019, a resident of the Seven Oaks Post Office delivery area in Detroit (48235) reported finding trash bags full of mail in an alley behind their home on three separate occasions. Postal Inspectors retrieved these bags of mail and found that they contained mailings for a variety of addresses in the Southfield area and surrounding communities.

7. Since the discovery of this abandoned mail reports of mail theft in the areas of Bloomfield Township, West Bloomfield, Novi, Northville, Farmington Hills, Franklin, and

Beverly Hills, Michigan continued to be received by local policing authorities. Several suspects were developed as a result of this investigation and it appears that these subjects are working in concert to perpetrate mail thefts and associated financial crimes.

8. In March 2019, Affiant obtained several police reports from the Franklin, Michigan, Police Department that related to this investigation. One of those reports detailed the theft of several business checks placed as outgoing mail in the mailbox belonging to M.G.S., who resided on Woodside Drive in Franklin. This complainant reported that four of those checks had been cashed, which amounted to a total of \$13,599.51. The complainant provided Franklin Police Department with copies of the four checks they knew to have been cashed.

9. Affiant also obtained a report from Franklin Police Department that detailed the theft of a Bank of America debit card from the mailbox of a resident of Hickory Lane in Franklin on February 28, 2019. That resident supplied Franklin Police Department with surveillance footage depicting a gray/silver sedan stopped at their mailbox on February 28, 2019. The resident's debit card was used in an attempt to make \$1,080.45 in purchases from a Target in Farmington Hills on March 8, 2019. Detective Bastianelli, employed by the Franklin Police Department, obtained surveillance footage of the individuals responsible for the transactions at Target. That surveillance showed a younger male subject, later identified as Cole CASTELOW, and an unidentified female subject who were connected to a black Toyota Camry bearing license plate DSS 0538. Detective Bastianelli learned through his investigation that the Toyota Camry was an Enterprise rental. This vehicle was rented to Deavon ALLEN, who provided his address as 17360 Murray Hill, Detroit, MI 48235.

10. Affiant contacted Investigator Finocchario, employed by Bank of America, regarding the stolen business checks reported by M.G.S. to the Franklin Police Department. This

investigator researched the checks in their records system and found that the checks had been negotiated using Bank of America accounts in the names of Deavon ALLEN, Kemani PERRYMAN, James MANN, and Bobbie JACKSON. Bank of America records show that numerous checks made payable to other parties residing in the same areas from which the stolen checks had originated were also deposited into these accounts. Other transaction activity in the accounts was reviewed and several Zelle transfers to Chaste DAVIS and Ronald REESE were made using the accounts of ALLEN and MANN. ATM surveillance from the deposits of these checks was obtained and reviewed. These images were compared to known State of Michigan driver's license images for the subjects of this investigation. ALLEN, MANN, JACKSON, CASTELOW and REESE are seen in the ATM surveillance footage. ALLEN is seen driving the black Toyota Camry bearing license plate DSS 0538 previously mentioned, while making a deposit of a check confirmed to have been stolen to the account of MANN on March 18, 2019. ALLEN and JACKSON are seen together on February 26, 2019, depositing two of the stolen checks from Franklin to their respective accounts. REESE is seen at an ATM transaction with ALLEN on April 4, 2019, during which ALLEN deposits a check stolen from Farmington Hills, Michigan, to ALLEN's account. CASTELOW was seen in the ATM surveillance provided by Bank of America at an ATM deposit of one of the stolen checks from Franklin to the account of Kemani PERRYMAN on March 10, 2019.

11. Affiant obtained additional records related to vehicle rentals made to Deavon ALLEN from Enterprise. Those records show that the Toyota Camry bearing license plate DSS 0538 was rented to Deavon ALLEN on February 28, 2019 through March 28, 2019. A Fifth Third credit card in the name of Ronald REESE was used to make two payments on that rental contract.

12. Information gathered during the course of this investigation indicates that Ronald REESE and Chaste DAVIS are in a relationship and previously resided at 19737 Forrer St, Detroit, MI 48235 (herein the Subject Premises). A vehicle previously seen at the address 901 Taylor St, Detroit, MI 48202, was consistently seen at the Subject Premises by investigating agents during the investigation. The Taylor Street address is the residential address listed on Chaste DAVIS' Michigan operator license record. The vehicle seen at both the Taylor Street address, and then more recently at the Subject Premises, is a 2003 Mitsubishi Eclipse bearing license plate DTR 0523. This vehicle is registered to Claudelle Davis. Investigation has determined Claudelle Davis is Chaste DAVIS' mother.

13. On September 13, 2019, postal inspectors retrieved trash abandoned in a trash receptacle in front of the Subject Premises. Inside that trash were several items relevant to this investigation. There was a letter from the Wells Fargo Fraud and Claims Management department addressed to B.C. at the Subject Premises; Citi credit card convenience checks addressed to S.K. at an address in South Lyon, Michigan; and check 3034 from a J.P. Morgan Chase account belonging to W.H. LLC located in Bloomfield Hills, Michigan. Other than the seized items, neither B.C., S.K., nor W.H. LLC were known to be associated with the Subject Premises during the investigation.

14. Affiant conducted research in investigative databases and located B.C. at an address in Farmington Hills, Michigan. Affiant met with B.C. at that address on September 18, 2019. B.C. stated he/she had received notice from U.S. Bank recently regarding a fraudulent application for an account using his/her personal information. B.C. provided a copy of a letter received from U.S. Bank regarding that application. B.C. advised he/she did not apply for any accounts with Wells Fargo either, and denied any affiliation with the Subject Premises. B.C.

stated that though he/she is unaware of any mail theft activity, the mail for his/her address is delivered across the road. B.C. later contacted Wells Fargo and was told that the application for an account using his/her personal information had been denied.

15. On September 27, 2019, Affiant spoke with B.C. regarding this investigation. B.C. stated that he/she had just learned of another attempt to open an account at PNC Bank using his/her PII and the address of the Subject Premises. B.C. also stated that his/her recent credit report lists the phone number (313) 806-6608, which is a phone number that is unfamiliar to him/her.

16. On September 16, 2019, Affiant contacted J.P. Morgan Chase Bank regarding check 3034 in connection with the account of W.H. LLC located in Bloomfield Hills, Michigan. Their records showed the account had been frozen, however, recently five checks had been written against the account, which were all negotiated via mobile deposit. Some of these checks had been returned as unpaid. The checks written against the account are number 3015 made payable to Dakota Haley in the amount of \$1955.58 for "lawn service"; number 3013 made payable to Kylin Bailey in the amount of \$800 for "landscaping"; number 3009 made payable to Ashley Bommer in the amount of \$900; number 3010 made payable to Tiara Hayes in the amount of \$900 for "rent"; and number 3008 made payable to Kylin Bailey in the amount of \$1000 for "One Guard Watch Dogs".

17. Affiant learned that M.H. had filed police report 19-21113 with the Bloomfield Township Police Department regarding the theft of business checks mailed to him/her from J.P. Morgan Chase for his/her business, W.H. LLC. M.H. was expecting these checks in June 2019 but never received them. On July 20, 2019, M.H. checked their account and learned two checks had been written against the W.H. LLC account without his knowledge or permission. These

were checks 3008 and 3013 made payable to Kylin Bailey. Research revealed records for Kaylin Bailey, who has previously been arrested for retail fraud.

18. On September 19, 2019, Affiant contact M.H. to further discuss the J.P. Morgan Chase Bank checks related to his/her business account in the name of W.H. LLC that were stolen and falsely negotiated. M.H. confirmed he/she had not made checks 3008, 3009, 3010, 3013, or 3015 payable to any of the parties listed in paragraph 18. M.H. also stated he/she did not give anyone permission to be in possession of these checks. M.H. said his/her mail is received at the road.

19. On September 15, 2019, Affiant reviewed mail staged for delivery to the Subject Premises at the U.S. Postal Service. Affiant observed several pieces of first-class mail addressed to different individuals from financial entities. One of these mailings appeared to contain a credit card.

20. Search warrants for the Subject Premises and a 2004 Ford Taurus bearing Michigan license plate DKG 7538, herein the Subject Vehicle, were executed on October 2, 2019. The Subject Vehicle was parked in the driveway of the Subject Premises at the time of this search. Investigating agents found this vehicle is registered to Claudelle DAVIS, Chaste DAVIS' mother. Amongst other things, the search warrants authorized the seizure of items relevant to the crimes of Mail Theft, Identity Theft and/or Access Device Fraud, including electronic devices.

21. During the search of the Subject Premises investigating agents found several boxes full of mailings, checks, credit cards, and identification that does not belong to Ronald REESE or Chaste DAVIS. A significant amount of evidence indicative of the crimes of mail theft and identity theft were found throughout the Subject Premises. Specifically, agents found

checks from the areas of Farmington Hills, West Bloomfield, Bloomfield Hills, Southfield, Troy, Rochester Hills, and Novi. Several of these checks were business checks belonging to M.G.S., the resident on Woodside Drive in Franklin, Michigan, who filed the complaint with the Franklin Police Department detailed in paragraph eight above. Many of the checks found were endorsed on the back with the name "Ronald REESE", and some of the checks were made payable to other suspects identified in the investigation, including Cole CASTELOW. Agents also found various mailings from Novi, Troy, Franklin, and West Bloomfield. A mailing from Wells Fargo addressed to victim B.C., B.C.'s driver's license, and debit cards from Huntington Bank and Wells Fargo bearing B.C.'s name were also found at the Subject Premises. Note that during the search documents, such as photos, mailings and records, were also found showing that REESE and DAVIS have dominion over the residence. One of the photographs was a group shot that included REESE, Deavon ALLEN, Cole CASTELOW, and an unknown man. Investigating agents also noticed that mailings and notebooks, including one addressed to T.W. in West Bloomfield, were located inside the Subject Vehicle.

22. On October 4, 2019, Affiant received a call from Chaste DAVIS, who stated she had just arrived home and learned that investigating agents conducted a search of her residence, the Subject Premises, after finding the paperwork agents left there. DAVIS stated she has never been involved with anything like this situation, and that she was pregnant and did not have time to deal with it. DAVIS agreed to meet with Affiant, but later cancelled the meeting and stated she would call another time to reschedule. This meeting never took place.

23. Search warrants were also obtained for two cell phones seized as a result of the search of the Subject Vehicle, and an extraction of data stored was performed on those phones. This extraction identified data indicative of an identity theft and financial fraud scheme. This

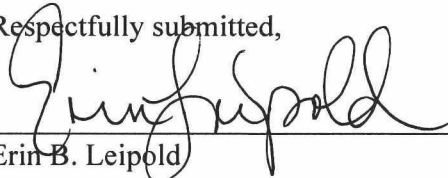
included screenshots of account numbers tied to different names, which appear to have been obtained from a database. The phone these images were stored on also contained a video Ronald REESE took of himself that appears to be related to a social media account.

24. Records were obtained for an account in the name of Ronald REESE at Fifth Third Bank. These records confirm REESE's bank account was used to make two payments for the rental of the Toyota Camry bearing license plate DSS 0538, mentioned above, from Enterprise. They also confirm funds were received in REESE's account via Zelle from Deavon ALLEN, James MANN, and Malik FRAZIER. These records also confirm two Zelle transfers were deposited in REESE's account from a Wells Fargo account in the name of B.C. Investigation has determined that B.C. did not open an account at Wells Fargo. Evidence suggests REESE opened the account using B.C.'s identity in order to further his fraud scheme. Finally, the Fifth Third Bank records included copies of numerous checks deposited in REESE's account in 2018. The addresses of the makers of these checks are in Bloomfield Hills, Southfield, Troy, Farmington Hills, West Bloomfield, and Franklin, Michigan. These are areas known to have been targeted for mail theft by the suspects in this investigation. The checks are made payable to a variety of parties who are not REESE, however, his signature is endorsed on the back of the check.

25. This investigation has identified more than 800 victims, most of whom reside in the metro Detroit area. It appears several suspects identified through this investigation, including Ronald REESE, stole mail from residents in the metro Detroit area on a continuing basis between 2018 and 2019. They obtained items of value, including checks, credit cards, credit card information, and identification, from the mail they stole, which they then used for their personal enrichment.

26. Based on the totality of the facts and circumstances described above, along with Affiant's training and experience, probable cause exists to believe that Ronald REESE has committed violations of federal criminal laws, specifically, 18 U.S.C. § 1708 (Theft of Mail), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C § 1029 (Access Device Fraud).

Respectfully submitted,



Erin B. Leipold
U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to before me and signed in my presence
and/or by reliable electronic means.



David R. Grand

UNITED STATES MAGISTRATE JUDGE

June 9, 2021